

ORIGINAL

OCT 28 2003

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

LUTHER B. THOMAS, Clerk

By:

Deputy Clerk

IN RE: TRI-STATE ) MDL DOCKET NO. 1467  
CREMATORY LITIGATION )  
)

This relates to all actions.

**NOTICE OF DEPOSITION AND NOTICE TO PRODUCE**  
**AT DEPOSITION OF LUIS LORENS**

TO: A1 Environmental Consulting Services  
c/o Joseph T. Lehman, Esq.  
Copedge & Leman, P.C.  
508 South Thornton Ave.  
Dalton, GA 30720

Please take notice that, pursuant to §§ 26 and 30 of the Federal Rules of Civil Procedure the Funeral Home Defendants will take the deposition of **Luis Llorens** upon oral examination on **Wednesday, October 29, 2003 beginning at 9:00 a.m.** at the offices of **Goodman, McGuffey, Lindsey & Johnson, LLC., Suite 200, 1245 West Fairbanks Street, Winter Park, Florida 32789.**

The deposition will be taken before an officer duly authorized by law to administer oaths, and will continue until completed.

You are also requested to bring with you to your deposition for inspection and copying the following documents or other tangible things:

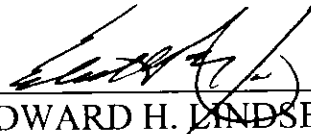
1. Any and all documents provided to you by the law firm of Coppedge & Leman or any other attorney including, but not limited to, invoices, cancelled checks, purchase orders or other written instruments;
2. Any and all documents relied upon by you in preparing your expert report; and
3. Any and all documents prepared by you, including worksheets, memorandums, interview notes or summary documents.
4. Any and all video tapes relied on by you in preparing your report.
5. Copies of any and all deposition transcripts relied on by you in preparing your report.
6. Copies of any and all Affidavits provided to you in support of your report.
7. Any and all records or invoices showing purchases of gas by Tri-State Crematory and relied on by you in preparing your report.

This 24<sup>th</sup> day of October, 2003.


Respectfully Submitted,

GOODMAN, MCGUFFEY, LINDSEY &  
JOHNSON LLP

By:

  
EDWARD H. LINDSEY, JR.  
Georgia State Bar No. 453075

By:

  
J. ANDERSON DAVIS, ESQ.  
Georgia State Bar No. 211077

FUNERAL HOME DEFENDANTS LEAD/  
LIASON COUNSEL

Attorneys for Defendants

R. Dudley Barton & Son Funeral Home, Inc.,  
Erwin-Petitt Funeral Home, Inc., R. D. Moore  
Funeral Home Inc., Ryan Funeral Home Inc.,  
Sequatchie Valley Memorial Funeral Home and  
Gardens, Inc., Taylor Funeral Home of  
Chattanooga, Inc. and Thomas & Son Funeral  
Home, Inc.

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**CERTIFICATE OF FONT AND POINT SIZE**

The font and point style used in this **NOTICE OF DEPOSITION AND  
NOTICE TO PRODUCE AT DEPOSITION OF LUIS LORENS** is Times New  
Roman 14 Point.

This 24<sup>th</sup> day of October, 2003.

Respectfully Submitted,

GOODMAN, MCGUFFEY, AUST  
& LINDSEY, LLP

  
\_\_\_\_\_  
EDWARD H. LINDSEY, JR.  
Georgia State Bar No. 453075

Attorneys for Defendants

R. Dudley Barton & Son Funeral Home, Inc.,  
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Funeral Home Inc., Ryan Funeral Home Inc.,  
Sequatchie Valley Memorial Funeral Home and  
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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served upon counsel in the above captioned lawsuit a copy of the foregoing **NOTICE OF DEPOSITION AND NOTICE TO PRODUCE AT DEPOSITION OF LUIS LORENS** by depositing same in the United States Mail with proper postage affixed thereon and addressed to:

Robert H. Smalley, III, Esq.  
McCamy, Phillips, Tuggle &  
Fordham, LLP  
P.O. Box 1105  
Dalton, GA 30720

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Joseph T. Lehman, Esq.  
Copedge & Lehman, P.C.  
508 South Thornton Ave.  
Dalton, Ga. 30720

This 24<sup>th</sup> day of October, 2003.

By: 

EDWARD H. LINDSEY, JR.

Georgia State Bar No. 453075

Attorneys for Defendants

R. Dudley Barton & Son Funeral Home, Inc.,  
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Funeral Home Inc., Ryan Funeral Home Inc.,  
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